

Law Office of Evan L. Lipton
250 West 55th Street, Floor 30
New York, New York 10019
(917) 924-9800
ell@evanliptonlaw.com

MEMO ENDORSED

March 17, 2022

3/18/22

By ECF
Hon. Colleen McMahon
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Defendant will be released
on the conditions agreed upon by
the Govt. and defendant, as
memorialized below.

Colleen McMahon

Re: *United States v. Gary Brown et al*, 22 Cr. 82 (CM)

Dear Judge McMahon:

I write as counsel to Gary Brown in the above-referenced matter, with the consent of the government, to respectfully request Mr. Brown's release upon the following conditions:

Proposed Conditions:

- (1) \$250,000 personal recognizance bond co-signed by two financially responsible co-signers and one moral suasion;
- (2) travel restricted to the Southern and Eastern Districts of New York, the District of New Jersey, and other districts with the consent of the Government or Pretrial Services, enforced by standalone GPS monitoring;
- (3) surrender of all travel documents and no new applications;
- (4) defendant not to possess firearms or dangerous devices;
- (5) Pretrial Services supervision as directed; and adherence to all other standard conditions of release.

USDC SDNY
DOCUMENT
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Thank you for your consideration of this matter.

Respectfully yours,



Evan L. Lipton
Counsel to Gary Brown

Cc: Government counsel (by ECF and email)